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Marianne L. Horinko, Acting Adminstrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on the HPV Test Plan for Linear Alkylbenzene (LAB) Sulfonic Acids category

Dear Administrator Horinko:

The following comments on the LAB Sulfonic Acids Coalition test plan for the chemical category Linear Alkylbenzene (LAB) Sulfonic Acids are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

The LAB Sulfonic Acids Coalition submitted its test plan on May 20, 2003 for the LAB Sulfonic Acids category which consists of three chemicals: Benzene sulfonic acid, C_{10-16} alkyl derivatives (CAS No. 68584-22-5), Benzene sulfonic acid, dodecyl (CAS No. 27176-87-0), and Benzene sulfonic acid, tridecyl (CAS No. 25496-01-9). These linear alkylbenzene (LAB) sulfonic acids are intermediates in the manufacture of linear alkylbenzene sulfonate (LAS) surfactants, a major cleaning agent in laundry detergents. LAB sulfonic acids are used exclusively as intermediates in the production of LAS surfactants and are NOT present at all in consumer products. This coalition has appropriately grouped these three acids together into a single category based on their nearly identical structure and similar toxicological properties. Furthermore, hazard assessment data from LAS (compiled and submitted under the OECD SIDS program) was used to bridge data gaps for repeated dose, reproductive, and developmental toxicity for LAB sulfonic acids. Given the close relationship, i.e. physicochemical properties and toxicity, between LAB sulfonic acids and LAS, this approach is justified and commended. The LAB Sulfonic Acids Coalition has submitted a comprehensive analysis of the chemicals in this category by compiling substantial amounts of data from in-house studies, toxicology databases, published sources and data on LAB Sulfonic Acids produced in the E.U. When considering the toxicity of a chemical, these approaches demonstrate a thoughtful analysis by the coalition that maximizes the use of existing data in order to limit additional animal testing.

In addition to hazard assessment, the sponsor considers potential exposure to LAB sulfonic acids and appropriately concludes that no significant exposure is expected to occur for workers, consumers, or the environment. Information from existing data for physicochemical properties, environmental fate, and human and environmental effects of LAB sulfonic acids, as well as the limited exposure potential of these chemicals, have led the LAB Sulfonic Acids Coalition to conclude that no additional testing is necessary under the HPV Challenge program.

We applaud the sponsor on a well-written, thorough test plan for the category LAB Sulfonic Acids and concur that no additional testing is needed for the purposes of the HPV program. Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 327, or via e-mail at meven@pcrm.org.

Sincerely,

Megha Even, M.S.
Research Analyst

Chad B. Sandusky, Ph.D.
Director of Research